

2.0 PROJECT ALTERNATIVES

Alternative means of implementing the Proposed Action considered by the Tribe are described in the following section. The No Action Alternative is also considered for purposes of NEPA compliance only. The No Action Alternative is not considered for the purpose of compliance with §10.8 of the Compact, which provides that the Tribe need not consider alternatives that would cause it to forego its right to engage in IGRA gaming on its Indian lands. The purpose of the alternatives analysis is to provide a range of reasonable alternatives and allow informed decisions concerning the environmental consequences of the Proposed Action and the alternatives by responsible and reviewing agencies, the public, and decision makers. If a significant effect on the environment is identified, the Compact requires consideration of a range of reasonable alternatives which would avoid or substantially lessen any such effect. Infeasible alternatives need not be examined. And alternatives that have substantially similar consequences need not be examined.

Three alternatives are investigated in this section. These alternatives include the Proposed Project, the Expanded Casino Alternative, and the No Action Alternative. Two additional alternatives were evaluated but eliminated from further study: the Reduced Project Alternative and the Project Alternative with Hotel Height Lower than Ten Stories.

In addition to the alternatives discussed below, Section 4.0 separately discusses alternatives considered due to public comments received on the aesthetic impacts of the Proposed Project related to the height of the hotel. As a result of those comments, the Tribe reduced the height of the hotel in the Proposed Project from 23 stories to 19 stories. Section 4.0 examines other, lower height alternatives in reference to aesthetic impacts.

2.1 Proposed Project Alternative

The initial Proposed Project included the construction and operation of an approximately 65.7-acre resort with a casino, 23-story hotel, retail and food and beverage venues, luxury spa, pool and associated resort facilities, multi-purpose events center, conference and meeting center, administrative and back-of-house facilities, parking, additional water wells, new water reservoir, and expanded wastewater treatment system.

As a result of public comments received regarding the height of the hotel, the Tribe examined whether it could reduce the height of the hotel and still meet its project goals. The Tribe determined that it could do so with a 19-story hotel on a 69.1-acre project footprint. As a result of further economic and design considerations, the Tribe reduced the gaming area to 73,583 square feet and increased the casino's circulation area as well as the areas for the conference facility and the administrative and service facilities (e.g., back-of-house). It also reduced the resort facilities, multipurpose events center, and hotel areas. It was also determined that a new 500,000-gallon water reservoir would suffice rather than a 1,000,000-gallon reservoir, and that a new percolation pond system for treated wastewater would be constructed. The locations of the major project components of the initial Proposed Project, including the casino and hotel, water reservoir, wastewater treatment plant expansion, and SR-76/Pauma Reservation Road

intersection improvements are shown in Figure 4, and those of the Proposed Project, as modified, are shown in Figure 4A. A more detailed site plan of the casino and hotel resort amenities under the initial Proposed Project is provided in Figure 5, and those of the Proposed Project as modified are shown in Figure 5A. The major components of the initial Proposed Project are summarized in Table 1 and those for the Proposed Project, as modified, are summarized in Table 1A.

Casino

The new casino would feature approximately 102,372 square feet within a single-level floor plan. There would be 73,583 square feet of gaming area and 28,789 square feet used for circulation, public amenities, cage/cashier, players reward area, kiosks, etc. The gaming area would contain enough space to accommodate up to 2,500 machines. There would also be 50 table games that would include Blackjack, Mini-Baccarat, Pai Gow, Poker, Caribbean Stud, Let It Ride, Three Card Poker, and 10 poker tables. The main casino entry would open onto the surface parking lot, towards the southeast. Other entrances would be provided to the pool, retail, food and beverage areas, parking garage, and multi-purpose events center.

Hotel

The Proposed Project includes a 19-story hotel tower with 384 rooms that would be constructed adjacent to the casino on its north side. One floor would be constructed below ground level.

Associated with the hotel would be an additional 16 villa suites averaging about 950 square feet in an area constructed at ground level in the northwest portion of the Project Site. The hotel and villas would have a total of approximately 323,137 square feet.

Food & Beverage and Retail

Additional area on the main floor of the casino would contain a combined area of 56,500 square feet with multiple food and beverage facilities and retail shops. The food and beverage facilities would include a coffee shop, fine dining restaurant, several attraction restaurants, food court, buffet, and bars and lounges. Specialty retail shops would occupy about 4,000 square feet.

Resort Amenities

Resort amenities would be located generally north of the casino and west of the hotel tower on about 16,842 square feet. These amenities would include a 10,500-square-foot luxury spa with treatment rooms, a fitness center, and retail boutique. There would also be a large pool with VIP cabanas, snack bar, and pavilion. The pavilion would be used for small events such as weddings, birthday parties, and other special events.



Figure 4
Location of Major Components of Initial Proposed Project

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Figure 4a
Location of Major Components Modified Proposed Project

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Figure 5
Casino and Hotel Site Plan of the Initial Proposed Project

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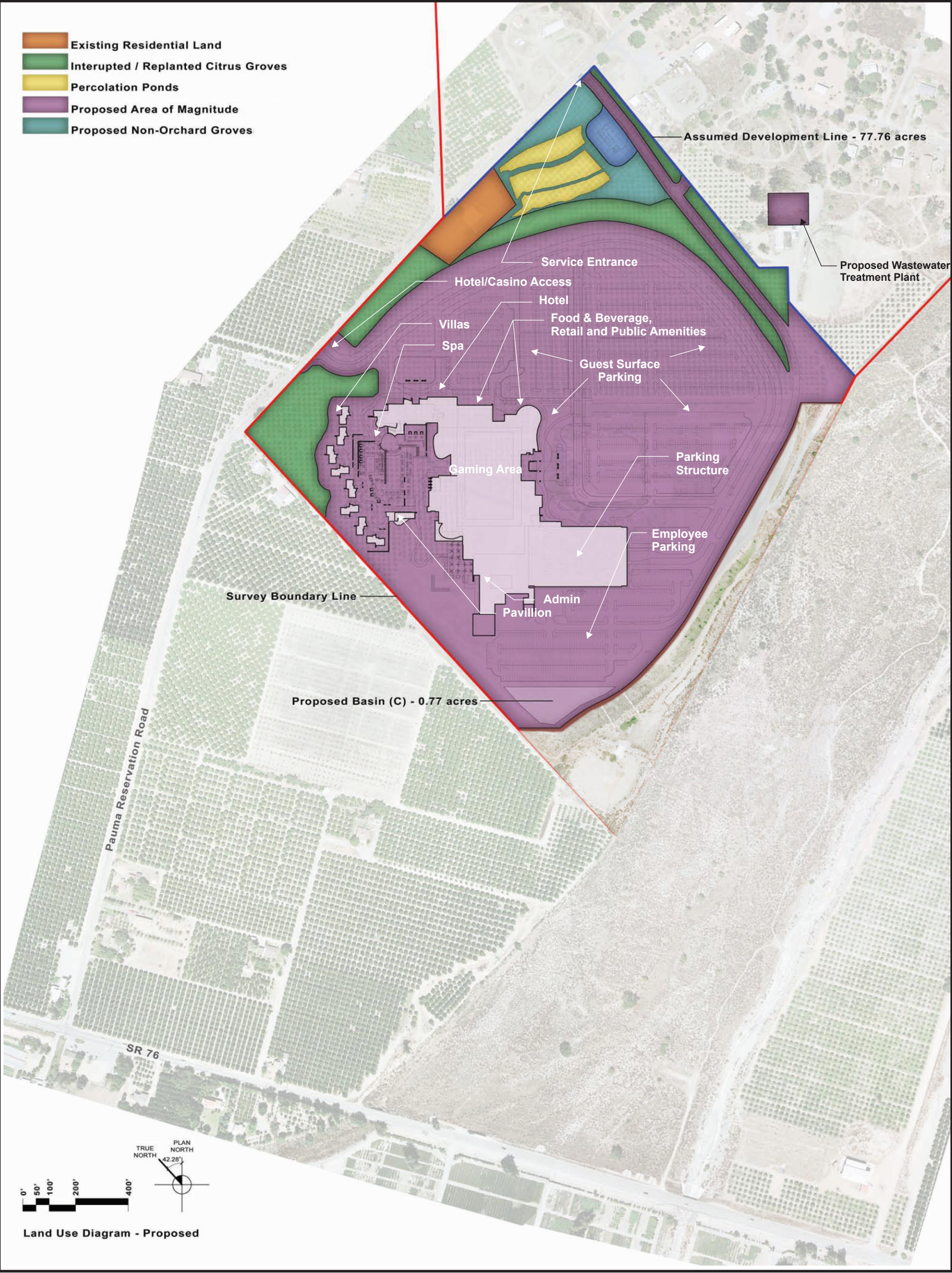


Figure 5a
Casino and Hotel Site Plan of Modified Proposed Project

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Table 1. Major Components of Initial Proposed Casino and Hotel Project

| Project Component | Approximate Square Footage | Other Characteristics |
|---------------------------------------|--|--|
| Casino | 110,000 sq. ft with 83,100 sq. ft. gaming area and 26,900 sq. ft. circulation, cage/cashier, players reward area, kiosks, etc. | 2,000 slots with expansion capability up to 2,500; 50 table games; and 10 poker tables |
| Hotel | 330,000 sq. ft. | 23-floor tower with 400 rooms (384 standard rooms and 16 ground-level villa suites) |
| Food & Beverage and Retail | 56,500 sq. ft. | Coffee shop, fine dining restaurant, multiple attraction restaurants, food court, buffet, bars and lounges, specialty and retail shops |
| Resort Facilities | 18,000 sq. ft. | Spa, pool and lawn garden, bar, pavilion |
| Multi-Purpose Events Center | 34,000 sq. ft. | Flexible space for special events including banquets, concerts, weddings, and parties |
| Conference and Meeting Center | 33,600 sq. ft. | Conference/meeting space including board rooms and a state-of-the-art Corporate Conference Center with tiered seating for 200 and audio/visual capability |
| Administrative and Service Facilities | 105,000 sq. ft. | Back-of-house administration, operations, shipping and receiving, building systems, central plant |
| Parking | | 6-level 1,500-space garage; 2,400-space surface including approx. 700 spaces for employees |
| Water | | Three new wells; new approx. 1,000,000-gallon reservoir |
| Wastewater Treatment Facility | | Designed for 227,500 gpd for average day and 284,000 gpd for peak day |
| Traffic Improvements | | SR-76 and Pauma Reservation Road Intersection (approximately 2,000 feet northwest and 1,000 feet southeast on SR-76, and 500 feet northeast on Pauma Reservation Road) |
| Sediment Retention Basin | | A third sediment retention basin to be added in the southwest corner of the Project Site |

Table 1a. Major Components of Modified Proposed Casino and Hotel Project

| Project Component | Approximate Square Footage | Other Characteristics |
|---------------------------------------|--|--|
| Casino | 102,372 sq. ft with 73,583 sq. ft. gaming area and 28,789 sq. ft. circulation, cage/cashier, players reward area, kiosks, etc. | Up to 2,500 slots; 50 table games; and 10 poker tables |
| Hotel | 323,137 sq. ft. | 19-floor tower with 384 standard rooms and 16 ground-level villa suites totaling 400 rooms |
| Food & Beverage and Retail | 56,500 sq. ft. | Coffee shop, fine dining restaurant, multiple attraction restaurants, food court, buffet, bars and lounges, specialty and retail shops |
| Resort Facilities | 16,842 sq. ft. | Spa, pool and lawn garden, bar, pavilion |
| Multi-Purpose Events Center | 19,383 sq. ft. | Flexible space for special events including banquets, concerts, weddings, and parties |
| Conference and Meeting Center | 34,902 sq. ft. | Meeting space including board rooms |
| Administrative and Service Facilities | 120,547 sq. ft. | Back-of-house administration, operations, shipping and receiving, building systems, central plant |
| Parking | | 6-level 1,500-space garage; 2,350-space surface including approx. 700 spaces for employees |
| Water | | Up to three new wells with total capacity of 211,000 gpd; new approx. 500,000-gallon reservoir |
| Wastewater Treatment Facility | | Designed for 227,500 gpd for average day and 284,000 gpd for peak day with additional 250,000-gallon back up storage; new percolation pond system |
| Traffic Improvements | | SR-76 and Pauma Reservation Road Intersection (approximately 2,000 feet northwest and 1,000 feet southeast on SR-76, and 500 feet northeast on Pauma Reservation Road) |
| Sediment Retention Basin | | A third sediment retention basin to be added in the southwest corner of the Project Site |

Multi-Purpose Events Center

An approximately 19,383-square-foot multi-purpose events center capable of accommodating 1,500 seats would be constructed on the west end of the casino. The events center would be used for banquets, concerts, weddings, and meetings. Adjustable walls would allow room and hall sizes to be tailored to accommodate specific events, and in some instances multiple events may occur simultaneously.

Conference and Meeting Center

A 34,902 -square-foot conference and meeting center would also be constructed to the west of the casino, adjacent to the multi-purpose events center. This facility would contain several Boardrooms and other small conference rooms.

Administrative And Service Facilities

A 120,547-square-foot administration and back-of-house center would be constructed southwest of the casino and adjacent to the multi-purpose events center, and partially below the casino. This center would contain the back-of-house administrative offices and associated facilities, operations, shipping and receiving facilities, building systems, and central plant.

Parking And Circulation

Parking accommodations would include a six-level parking garage with 1,500 spaces, and a surface parking lot with approximately 2,350 spaces. Of the surface lot spaces, approximately 700 would be for employees and the remainder for guest self-parking and valet service. Bus parking would also be located on the surface lot. The main access to the casino and hotel would be off of Pauma Reservation Road as illustrated in Figure 4. A separate service access would also be constructed off of Pauma Reservation Road, approximately 1,000 feet east of the main access (Figures 4 and 5).

Wells And Reservoir

Up to three new wells would be constructed to supplement groundwater production from existing wells on the Reservation. The existing wells have an average capacity of producing 233,000 gallons per day (gpd). The three new wells would have a combined production capacity of 211,000 gpd which would meet the Proposed Project's daily water demands, as well as water for domestic and fire flow purposes and would provide backup capacity. The new wells would be constructed within the southern boundary of the Reservation. A new 500,000-gallon water reservoir would also be constructed to provide additional above-ground storage of treated water for peak use periods. This reservoir together with the existing reservoirs on the northeastern Reservation boundary would be capable of providing a combined 1,100,000 gallons of adequate water during peak periods of use as well as for fire fighting purposes.

Wastewater Treatment Facility

A Membrane Bioreactor (MBR) wastewater treatment facility located about 750 feet north of the northeast corner of the existing casino's parking lot currently treats an average sewage flow of approximately 30,000 gpd from the casino. The existing facility is designed to treat an average daily flow of 50,000 gpd, and would be expanded to include an Aero-Mod® treatment process to treat an average daily flow of 227,500 gpd and a maximum day flow of 284,000 gpd. The incremental difference between the wastewater treatment designed capacity and the estimated average day water demand of 249,000 gpd and peak day average month demand of 311,000 gpd can be handled by the 250,000-gallon emergency storage tank. A percolation pond system will be also constructed to percolate the maximum daily flow.

Traffic Improvements

The intersection at SR-76 and Pauma Reservation Road would be signalized. Improvements at this intersection, as described in the Reservation Transportation Authority (RTA) SR-76 Corridor Study, would also include a longer eastbound left turn lane from SR-76 onto northbound Pauma Reservation Road, a westbound right turn lane from SR-76 onto northbound Pauma Reservation Road, a southbound right turn lane from Pauma Reservation Road onto westbound SR-76, and a southbound left turn lane from Pauma Reservation Road onto eastbound SR-76. These improvements would be made under encroachment permits (and CEQA compliance) with Caltrans and the County of San Diego for their respective right-of-ways and would be paid for by the Tribe.

The RTA, which includes representatives from the gaming tribes along the SR-76 corridor, has been working with Caltrans to identify improvement needs and funding sources (including fair share contributions from the tribes) for improvements to SR-76 east of I-15 and to identify smaller individual projects that can be implemented relatively quickly to improve traffic flow and safety.

The Tribe signed a Cooperative Agreement with the County of San Diego regarding improvements to Pauma Reservation Road associated with casino development. Additional future post construction improvements are anticipated to be made to SR-76 by Caltrans as described in the RTA SR-76 Corridor Study.

Detention Basins

Two detention basins with a combined area of 1.1 acres exist just beyond the southeast corner of the Proposed Project Site. A third basin of 0.8 acres will be added within the Project Site boundaries and adjacent to the existing basins.

2.2 Expanded Casino Alternative

Under the Expanded Casino Alternative the existing temporary casino would be replaced and expanded as a permanent casino. The facility would accommodate 2,000 slot machines and would contain additional restaurants and administrative offices. However, no hotel would be constructed under this alternative, nor would there be retail space, a spa and pool, and a multi-purpose events center. Several acres of additional surface parking would be constructed, but a parking garage would not be constructed. Two new water wells, a storm water retention basin, and an approximately 300,000 water reservoir would be constructed, and the wastewater treatment plant would be expanded with a percolation pond system. Traffic improvements at the intersection of SR-76 and Pauma Reservation Road would be made as described under the Proposed Project. All adverse environmental effects described for the Proposed Project would also result under the Expanded Casino Alternative, but in lesser amounts. Specifically, this alternative would result in substantially similar impacts to aesthetics, agriculture, air quality, geology/soils, hydrology/water resources, noise, traffic/circulation, public services, utilities and service systems, socioeconomic (gambling addiction), land use, biological resources, cultural resources, hazards/hazardous materials, mineral resources, population and housing. However, impacts to the socioeconomic conditions of the Pauma Tribe would be adverse relative to the Proposed Project.

2.3 No Action Alternative

Under the No Action Alternative, reviewed for NEPA compliance only, the Pauma Band of Mission Indians would not develop a casino and hotel facility as described in the Proposed Action. The existing casino would continue operating without change. If the No Action Alternative is selected, an adverse impact to Tribal socioeconomic conditions would occur as the existing Pauma Casino would not be competitive with other nearby Indian casino and hotel resorts. All other effects of the Proposed Action, both on and off site, would be avoided.

2.4 Alternatives Eliminated From Further Consideration

Other alternatives that were identified but eliminated from serious consideration included construction of the Proposed Project at other locations on the Reservation, a Reduced Proposed Project, and a Project involving a hotel with 384 rooms below 10 stories.

Alternative Locations

The Tribe briefly considered construction and operation of the Proposed Project at other locations on the Reservation. These other locations included situating the casino and hotel farther to the east, and in the triangular-shaped area on the north side of Pauma Reservation Road. However, both of these locations were eliminated early in the planning process as they would have placed the proposed facility considerably closer to homes on the Reservation, and in fact would have required the relocation of at least some families. In addition, water and wastewater infrastructure exists on the Project Site that does not exist elsewhere on the Reservation. The site proposed under the Proposed Project is the most distantly located site from

residences on the Reservation, and also provides the best access to casino and hotel patrons from SR-76 via Pauma Reservation Road. Off-Reservation sites were not considered because the Tribe may only operate a gaming facility on lands held in trust by the federal government on behalf of the Tribe.

Reduced Project Alternative

The Reduced Scope Proposed Project Alternative would involve the construction of a smaller permanent casino and hotel on the same site as described for the Proposed Project. This alternative, reflecting a project previously considered by the Tribe, would have been characterized by a casino of approximately 50,000 square feet for gaming (with additional area for circulation, cage/cashier, etc). The hotel would have been smaller with eight floors containing approximately 200 rooms. All other facilities would have been much reduced in size, including the multi-purpose events center, food & beverage facilities, retail, spa, and pool. The surface parking lot would have contained approximately 3,000 spaces, and there would not have been a parking garage under this alternative. Access to SR-76 would have been the same as that described for the Proposed Project, and traffic improvements would have been constructed at the intersection of SR-76 and Pauma Reservation Road. In addition, two new wells and an approximately 400,000-gallon water reservoir would have been constructed, and the wastewater treatment facility would have been expanded to treat 175,000 gallons per average day and 225,000 gallons per peak day. The Tribe eliminated this alternative early in the planning process as it determined that the costs required to construct such a facility would be substantial, and yet the facility would not allow them to be competitive with other tribal resorts in the local area.

Project Alternative With Hotel Height Lower Than 10 Stories

As set forth in Section 4.0, as a result of public comments regarding the aesthetic effects of the height of the hotel, three alternative hotel heights were considered: the 19-story hotel in the modified Proposed Project, a 13-story hotel alternative, and an alternative with a hotel consisting of a 10-story tower and a 9-story tower. Other alternative hotel heights lower than 10 stories were eliminated from further consideration because (a) tribal gaming facilities already existing in the area, the 21-story Rincon Harrah's and the 12-story Pala Casino Resort, are higher than 10 stories, (b) as the height of the hotel is lowered, the structure becomes wider and more spread out, with substantially similar aesthetic impacts upon views, (c) as hotel height drops below 10 stories, it becomes increasingly expensive, and (d) hotel heights below 10 stories fail to meet the Tribe's project goals of giving hotel patrons easy and convenient access to the casino.

Project Alternative With Hotel Height Between Fourteen and Eighteen Stories

As a result of public comments, the hotel height for the proposed project was lowered from 23 to 19 stories. For the purpose of examining aesthetic impacts, hotel heights between 14 and 18 stories were eliminated from further consideration because they would have substantially similar aesthetic impacts to the 19-story hotel of the modified Proposed Project, the 13-story alternative, and the alternative with a 10-story and a 9-story tower.

2.5 Comparison of Project Alternatives

No significant unmitigable effects would result from implementation of the Proposed Project. Socioeconomic benefits to the Pauma Tribe would be increased under the Proposed Project in comparison to the Expanded Casino Alternative and No Action Alternative. A comparison of the environmental impacts associated with the Proposed Project, Expanded Casino Alternative, and No Action Alternative is provided in Table 2.

Table 2. Comparison of Environmental Impacts of the Proposed Project and Other Project Alternatives

| Issue | Proposed Project | Expanded Casino Alternative | No Action Alternative (For NEPA purposes only) |
|--|--|--|---|
| Aesthetics | Less than significant after mitigation | Less than significant after mitigation | No impact |
| Agricultural Resources | No impact | No impact | No impact |
| Air Quality | Less than significant after mitigation | Less than significant after mitigation | No impact |
| Biological Resources | Less than significant after mitigation | Less than significant after mitigation | No impact |
| Cultural Resources | No impact (but mitigation provided in the event of accidental discovery) | No impact | No impact |
| Geology and Soils | No impact | No impact | No impact |
| Hazards and Hazardous Materials | Less than significant after mitigation | Less than significant after mitigation | No impact |
| Hydrology/ Water Resources | No impact | No impact | No impact |
| Land Use | No impact | No impact | No impact |
| Mineral Resources | No impact | No impact | No impact |
| Noise | Less than significant after mitigation | Less than significant after mitigation | No impact |
| Population and Housing | No impact | No impact | No impact |
| Public Services | Less than significant after mitigation | Less than significant after mitigation | No impact |
| Recreation | No impact | No impact | No impact |
| Socioeconomic (Gambling addiction) | No impact | No impact | No impact |
| Socioeconomic Conditions and Environmental Justice | No issues identified | No issues identified | Not applicable |
| Socioeconomic Impacts to Pauma Tribe | Beneficial Impacts | Less beneficial than Proposed Project | Less beneficial than Proposed Project |
| Transportation/Traffic | Less than significant after mitigation | Less than significant after mitigation | No impact |
| Utilities and Service Systems | No impact | No impact | No impact |

Proposed Project

The Proposed Project would result in potentially adverse impacts to aesthetics, air quality, biological resources, cultural resources, hazards and hazardous materials, noise, public services, and traffic/circulation. However, all these impacts would be maintained at levels less than significant through design and operational characteristics of the Project. The Proposed Project represents the best means for the Tribe to obtain economic benefit with minimal environmental effects. The proposed facility would also benefit northern San Diego County. The facility would provide full- and part-time jobs for a total of 2,200 employees. No environmental justice concerns have been identified through the analysis provided in this EA/TEIR. A disproportionately high and adverse human health or environmental impact on minority populations, low-income populations, or Indian tribes is not likely to result from the proposed action or from any of the alternatives.

Expanded Casino Alternative

The Tribe also entertained the construction of an expanded casino without a hotel. The existing temporary casino would be replaced with a larger permanent facility at its current location. The expanded facility would attract more patrons than the existing temporary casino, and would result in similar impacts as those described under the Proposed Project. However, the Expanded Casino Alternative would be much less desirable than the Proposed Project in terms of socioeconomic benefit to the Tribe. Construction costs would remain high under this alternative, yet considerable revenue would be lost in comparison with that from the Proposed Project, as the facility would not be as competitive as the major casino and hotel resorts in the area such as Pala, Rincon, and Pechanga. The Tribe would not be able to maximize its economic benefit under the Expanded Casino Alternative, thereby making this alternative less preferable than the Proposed Project.

No Action Alternative

The No Action Alternative, considered for NEPA purposes only, would avoid all adverse environmental effects associated with implementation of the proposed gaming facility.

Imposition of the No Action Alternative on the Tribe would be less preferable than approval of the Proposed Action. The Proposed Action would yield a significantly higher economic benefit to the Tribe and non-Indians in surrounding communities, and yet not result in significant environmental effects. In contrast, the No Action Alternative would represent a loss of potential economic benefit for the Pauma Band of Mission Indians and for northern San Diego County.

The potential economic and standard of living benefits associated with the operation of a gaming facility would not be realized with the No Action Alternative. The No Action Alternative is, therefore, not in the best interest of the Pauma Tribe. In fact, the Tribe has concluded that as the casino facilities at Pala, Rincon, and Pechanga have developed now into major hotel resorts, the existing Pauma Casino will not be able to compete with these destination hotel resort complexes.